From:	Laurie King
To:	Nelda Perez/R6/USEPA/US@EPA
Cc:	Greg Fife; Richard Ehrhart; Gary Miller/R6/USEPA/US@EPA; Cheryl Overstreet; Philip Turner; John Meyer/R6/USEPA/US@EPA
Subject:	Re: Question -- TCE & perc metabolite
Date:	12/22/2009 09:33 AM

Nelda -

We were aware of the uncertainty with TCE and took that into consideration on our site specific determinations. That doesn't mean we won't be asked...

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▼ Question -- TCE & perc metabolite

Question -- TCE & perc metabolite

Nelda Perez to: Laurie King

12/22/2009 09:03 AM

Cc: Greg Fife, Richard Ehrhart

Does this finding mean that the soil vapor intrusion projects in Grand Prairie and near Kelly AFB may have to be revisited? Does it have implications for the additional areas between Delfasco and the old Naval Air Station? Let me know your thoughts or impressions, please. I didn't make it to the meeting in Austin held by TDSHS.

Thanks,
Nelda

From Inside EPA

Reviewers Split On EPA Cancer Risk Finding For Key Solvents' Metabolite

A panel of experts is sharply divided over draft EPA findings that

trichloroacetic acid (TCA) -- a metabolite of the controversial solvents trichloroethylene (TCE) and tetrachloroethylene (perc) -- is a “likely” carcinogen by all exposure pathways, suggesting further controversy as EPA moves to craft risk values for the ubiquitous substances.

At a Dec. 10 meeting of experts in Arlington, VA, some panelists outright disagreed with EPA’s finding, saying they do not believe the chemical is a “likely” carcinogen. But other panelists said they agreed with the agency’s proposed classification.

The TCA Integrated Risk Information System (IRIS) assessment has been closely watched in large part because of the chemical’s relationship to chlorinated solvents, widely used chemicals that are contaminants at dozens of waste sites nationwide. Assessments for two of those solvents, TCE and perc, have also been long delayed by controversy. Both are considered wide-spread contaminants, with the possibility of large cleanup liabilities on the part of industry, the Defense Department, and the National Aeronautics and Space Administration (NASA), among others.

After 10 years of review and study, including a National Academy of Sciences (NAS) review, EPA recently unveiled a revised assessment of TCE. But NASA and the White House Office of Management & Budget (OMB) are now calling for a second round of NAS review.

EPA’s draft TCA assessment -- released in September -- describes the chemical as a “likely human carcinogen by all routes of exposure.” If finalized, the classification would be an upgrade from EPA’s existing cancer classification of “possible human carcinogen,” which was published in the IRIS database in 1996. The draft assessment includes a cancer slope factor, or estimate of oral cancer potency, of 0.2 milligrams per kilogram body weight per day (mg/kg-day). The agency’s existing IRIS cancer assessment did not include a quantitative risk estimate, due to limited data.

But at a panel of experts meeting in Arlington, VA, Dec. 10 to review the draft assessment, some panelists strongly criticized EPA’s determination.

“There is insufficient documentation for all routes of exposure. I’d support only oral and dermal,” said one of the reviewers, Penelope Fenner-Crisp, a consultant and former EPA toxicologist. “The ‘likely’ [classification] is too much, especially when you can’t resolve the mode of action.”

Michael Pereira of Ohio State University’s Comprehensive Cancer Center and Anthony Scialli of Tetra Tech Sciences agreed, voicing concerns that there was too little data to support the classification.

But Ivan Rusyn of the University of North Carolina and Andrew Salmon of California's Office of Environmental Health Hazard Assessment both agreed with EPA's classification, arguing that agency risk assessors had appropriately followed the agency's 2005 cancer guidelines. "Whether you like the guidelines or not is not the question," Rusyn said. "The agency has to err on the side of caution and assume that humans are as sensitive as the most sensitive species."

Consultant and review panel chairman Alan Stern said that he agreed with Rusyn and Salmon in principle, that the guidelines need to be followed. But Stern suggested that the agency had, in fact, not followed its guidelines, saying he believed the data showed only "suggestive" evidence of human carcinogenicity.

But consultant Ronald Melnick argued that the agency's classification did meet the guidelines. He noted that a chemical is not required to meet all four criteria to be considered a likely human carcinogen -- it only has to meet one.

Diana Wong, EPA's chemical manager for TCA, replied that the risk assessors "chose this classification because it needs to be consistent" with the guidelines and other IRIS assessments. She added that there was "a lot of internal discussion" among staff about the classification.

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